



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

MEMORANDUM

DATE: March 11, 1993
TO: Fred Nika, RPMS
FROM: Chris Liebman, Permit Section
SUBJECT: ARAR Review for Winnebago Reclamation
Landfill's RD/RA Work Plan



I have reviewed the following portions of the above-referenced work plan: the Leachate Management System, the Landfill Gas Management System, the Final Cover System and the Soil/Gas, Leachate and Air Monitoring Programs. In my review, I used the requirements of 35 Illinois Administrative Code, Subtitle G ("IAC"), Parts 810, 811, 812 and 814 as the standard against which I evaluated the proposals made in the work plan. However, since this is "Pre-RCRA" facility which may have accepted waste that today would be considered RCRA hazardous, the requirements of 35 IAC Part 724 may be a more appropriate standard.

In order to meet the requirements of 35 IAC, Parts 811, 812 and 814, the following information will need to be provided:

1. Design specifications and a construction quality assurance plan for the final cover pursuant to 35 IAC, 811.110(b) and (c), 811.314, 811.322, 811.503(a)(6) and 812.313;
2. Leachate monitoring parameters and schedules pursuant to 35 IAC, Part 721, Subpart C and Sections 722.111, 810.103, 811.202, 811.309(g), 811.319(a)(1)(C)(ii), and 812.308(a)(4);
3. Soil, gas, and air monitoring parameters and schedules pursuant to 35 IAC, 811.310(c) and (d), and 812.309; and
4. A proposal for below grade gas monitoring devices within the waste boundary pursuant to 35 IAC, 811.310(b)(1).

It should be noted that, if this facility wishes to continue disposal operations as an active landfill, it should be required to remain subject to all Federal and State permitting and design requirements based on the waste it receives. This is necessary to implement future regulatory requirements and to not significantly affect the competitiveness of the landfill operation.

CJL:lat/159Y,13